

1 DENNIS M. PRINCE  
2 Nevada Bar No. 5092  
3 ANGELA M. LEE  
4 Nevada Bar No. 14905  
5 **PRINCE LAW GROUP**  
6 10801 W. Charleston Blvd., Suite 560  
7 Las Vegas, NV 89135  
8 Tel: (702) 534-7600  
9 Fax: (702) 534-7601  
10 E-Mail: [eservice@thedplg.com](mailto:eservice@thedplg.com)  
11 -and-  
12 FARHAN R. NAQVI  
13 Nevada Bar No. 8589  
14 **NAQVI INJURY LAW**  
15 9500 W. Flamingo Road, Suite 104  
16 Las Vegas, NV 89147  
17 Tel: (702) 553-1000  
18 Fax: (702) 553-1002  
19 E-Mail: [naqvi@naqvilaw.com](mailto:naqvi@naqvilaw.com)  
20 E-Mail: [paul@naqvilaw.com](mailto:paul@naqvilaw.com)  
21 *Attorneys for Plaintiff*  
22

13 **UNITED STATES DISTRICT COURT**

14 **CLARK COUNTY, NEVADA**

15 LILIA JARRELL,  
16 Plaintiff,

17 vs.

18 WAL-MART STORES, INC.; WALMART INC.  
19 d/b/a WALMART #2593; INLAND  
20 DIVERSIFIED LAS VEGAS EASTERN  
21 BELTWAY, LLC; THE INLAND REAL  
22 ESTATE GROUP, INC.; INLAND REAL  
ESTATE INVESTMENT CORPORATION;  
DOES 1 through 100 and ROE  
CORPORATIONS 1 through 100, inclusive,

23 Defendant.

24 Case No.: 2:18-cv-01219-APG-VCF

25 **STIPULATION AND ORDER TO  
CONTINUE TRIAL (THIRD  
REQUEST)**

26 Plaintiff LILIA JARRELL (“Plaintiff”), by and through her attorneys of record,  
Dennis M. Prince and Angela M. Lee of PRINCE LAW GROUP, and Farhan R. Naqvi  
and Paul G. Albright of the law firm NAQVI INJURY LAW, and Defendants WAL-MART  
STORES, INC.; WALMART INC. d/b/a WALMART #2593 (hereinafter collectively



1 referred to as "Defendant Walmart"), by and through their attorneys of record, Robert  
 2 K. Phillips and Timothy D. Kuhls of the law firm PHILLIPS, SPALLAS & ANGSTADT,  
 3 LLC, submit this **STIPULATION AND ORDER TO CONTINUE TRIAL** for the  
 4 Court's consideration.

5 Good cause exists for continuing the trial date. The parties have diligently  
 6 prosecuted and defended this case, and have only requested short extensions of time  
 7 previously. The first extension was a result of the parties' stipulation to continue trial  
 8 on October 14, 2020 (ECF 43, 44). The second extension was a result of the parties'  
 9 stipulation to continue trial on February 10, 2021 (ECF 52, 53).

10 The parties have been diligent in this matter, but unforeseen circumstances have  
 11 made attending trial in December difficult. Additionally, Defendant's expert, Dr.  
 12 McIntire is not available to testify the week of December 13th. Accordingly, judicial  
 13 economy and efficiency favor a brief continuance of the trial in this matter. The parties  
 14 have also been working together in an attempt to settle this matter. A continuance of  
 15 trial will provide additional time for the parties to discuss settlement negotiations.  
 16 Moreover, should those negotiations not be successful, a brief extension of time will  
 17 provide the parties an opportunity to more fully prepare for trial in order to present  
 18 thorough and well briefed claims and defenses. Furthermore, continuing trial may allow  
 19 another unresolvable matter on the Court's lengthy trial stack to proceed to trial in a  
 20 more timely manner. Lastly, in the event the parties are unable to resolve this matter,  
 21 they will require some time to determine the availability and travel capabilities of  
 22 various witnesses and experts that reside out of state.

23 Accordingly, the parties are requesting a continuation of the trial date. The  
 24 current trial date is December 13, 2021, with the Calendar Call on November 23, 2021.  
 25 The parties respectfully request that the trial in this matter be continued to this Court's  
 26 February trial stack, or as soon thereafter as this matter may be heard. This will allow  
 27 the parties an adequate opportunity to further pursue resolution, as detailed above. The  
 28 parties likewise request a continuance of all other deadlines associated with trial in



1 accordance with the new trial date, including the deadline for filing motions in limine.  
2 This Stipulation to Continue Trial is made in good faith and not for purposes of delay.

3  
4 DATED this 12th day of November, 2021

DATED this 12th day of November, 2021

5 PRINCE LAW GROUP

PHILLIPS, SPALLAS & ANGSTADT

6 */s/ Dennis M. Prince*

*/s/ Timothy Kuhls*

7 DENNIS M. PRINCE  
8 Nevada Bar No. 5092  
ANGELA M. LEE  
9 Nevada Bar No. 14905  
10 10801 W. Charleston Blvd., Suite 560  
Las Vegas, NV 89135  
-and-  
11 FARHAN R. NAQVI  
Nevada Bar No. 8589  
12 PAUL G. ALBRIGHT  
Nevada Bar No. 14159  
13 NAQVI INJURY LAW  
Nevada Bar No. 14159  
14 9500 W Flamingo Road, Suite 104  
Las Vegas, Nevada 89147  
15 *Attorneys for Plaintiff*

ROBERT K. PHILLIPS  
Nevada Bar No. 11441  
TIMOTHY D. KUHLS  
Nevada Bar No. 13362  
504 South Ninth Street  
Las Vegas, Nevada 89101  
*Attorneys for Defendants*

16  
17 ORDER

18 The December 2021 trial dates and the November 2021 Master Trial Scheduling Conference  
19 are vacated.

20 Calendar Call is continued to February 22, 2022, at 9:00 a.m. in Courtroom 6C.

21 Jury Trial is continued to February 28, 2022, at 9:00 a.m. in Courtroom 6C.

22 Motions in limine deadline is continued to January 24, 2022.

23  
24 IT IS SO ORDERED:  
25  
26

27   
UNITED STATES DISTRICT JUDGE

28  
29 DATED: November 15, 2021

